

## **Lower Willamette Group**

**Co-Chairperson: Bob Wyatt, NW Natural**  
**Co-Chairperson: Jim McKenna, Port of Portland**  
**Treasurer: Kim Cox, City of Portland**

October 10, 2005

Mr. Jim Anderson  
Portland Harbor Section Manager  
DEQ Northwest Region  
2020 SW Fourth Ave, Ste 400  
Portland, OR 97201

**Re: Lower Willamette Group comments to the Interim Final DEQ/EPA Joint Source Control Strategy (JSCS)**


Dear Jim:

Enclosed are comments from the Lower Willamette Group (LWG) on the Interim Final DEQ/EPA Joint Source Control Strategy (JSCS). As those comments indicate, the LWG is pleased that the JSCS has been issued in Interim Final form, and it agrees with DEQ and EPA that implementation of the JSCS needs to be of the highest priority in order for necessary upland source control decisions to be made prior to making decisions about in-water remedial action.

To that end, the LWG would greatly appreciate the opportunity to meet to discuss plans for implementing the JSCS, particularly with respect to the weight-of-evidence assessments that we believe will be the backbone of the effort. We will be contacting you soon to determine whether such a meeting can occur in the near future.

Please note that the enclosed comments should not be construed as representing the view of the City of Portland, which is a member of the LWG. The City is engaged in a substantial amount of direct source control work with DEQ under a formal intergovernmental agreement and will discuss the JSCS with DEQ, EPA, and partners in that context.

Sincerely,



Jim McKenna  
Co-Chair

cc: LWG Executive Committee  
LWG Legal Committee